

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|------------------------------------|
| CAROLYN BARTHOLOMEW, | : | Civil Action No. 02-CV-2876 |
| | : | (Hon. Mary A. McLaughlin) |
| Plaintiff | : | |
| | : | |
| v. | : | |
| | : | |
| ST. LUKE'S HOSPITAL - ALLENTOWN | : | |
| CAMPUS, | : | Jury Trial Demanded |
| | : | |
| Defendant | : | |

DEFENDANT'S BILL OF COSTS

Judgment having been entered in the above-captioned action on the 13th day of May, 2003, against Plaintiff, Carolyn Bartholomew, the Clerk is requested to tax the following as costs:

BILL OF COSTS

1. Costs incident to taking of depositions (See Schedules I and II attached hereto) totaling \$836.05

2. Fees for copies of papers necessarily obtained for use in this case (See Schedule III attached hereto) totaling \$591.75

3. Filing fees for removing case from state court to federal court (See Schedule IV attached hereto) totaling \$172.00

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| CAMPUS, | : | |
| Defendant | : | |

ACKNOWLEDGMENT

| | | |
|------------------------------|---|-----|
| COMMONWEALTH OF PENNSYLVANIA | : | |
| | : | SS: |
| COUNTY OF LEHIGH | : | |

I, Scott C. Heckman, hereby swear that the foregoing costs are correct and were necessarily incurred in this action, and that the services for which fees have been charged were actually and necessarily performed. A copy hereof was this day mailed to Donald P. Russo, Esquire, counsel for Plaintiff, with postage fully prepaid thereon.

HEIMBACH, SPITKO & HECKMAN

Scott C. Heckman, Esquire
Sean M. Hart, Esquire
535 Hamilton Street, Suite 200
Allentown, PA 18101
(610) 821-7000

Attorneys for Defendant,
St. Luke's Hospital–Allentown Campus

Dated: May 21, 2003

Sworn to and subscribed before me
this ____ day of May, 2003.

Notary Public

Costs are hereby taxed in the amount of One Thousand Five Hundred Ninety-nine and 80/100 (\$1,599.80) Dollars this ____ day of _____, 2003 and that amount included in the judgment.

Michael E. Kunz, Clerk
United States District Court

By: _____
Chief Deputy Clerk

SCHEDULE I - DEPOSITION

A. Pretrial depositions taken by Plaintiff:

| | <u>Name</u> | <u>Date of Deposition</u> | <u>Amount of Pages</u> | <u>Cost</u> |
|----|--------------------------------------|----------------------------------|-------------------------------|--------------------|
| 1. | Jill Cavacini & Rochelle Schaller | 1/10/03 | 147 pages | \$283.75 |
| | | | Total | \$283.75 |

SCHEDULE II - DEPOSITION

A. Pretrial depositions taken by Defendant:

| | <u>Name</u> | <u>Date of Deposition</u> | <u>Amount of Pages</u> | <u>Cost</u> |
|----|---------------------|----------------------------------|-------------------------------|--------------------|
| 1. | Carolyn Bartholomew | 11/5/02 | 144 pages | \$552.30 |
| | | | Total | \$552.30 |

SCHEDULE III - COPYING COSTS

| | | |
|---------|--|-----------------|
| 6/14/02 | Copies @\$.15 per page x 745 pages; file Motion to Dismiss, Memorandum of Law and attached Exhibits..... | \$111.75 |
| 7/17/02 | Copies @\$.15 per page x 870 pages; File Defendant's Motion to Dismiss the Amended Complaint, Memorandum of Law and attached Exhibits..... | 130.50 |
| 10/7/02 | Copying Answers to Request for Production of Documents - 1,049 pages @\$.15 per page..... | 157.35 |
| 1/27/03 | Copies @\$.15 per page - 1281 pages; file Motion for Summary Judgment, Memorandum of Law and attached Exhibits..... | 192.15 |
| | Total | \$591.75 |

SCHEDULE IV - FILING FEES

| | | |
|---------|--|-----------------|
| 5/13/02 | Filing with U.S.D.C., E.D. Pa., Notice of Removal from Lehigh County Court of Common Pleas..... | \$157.00 |
| 5/17/02 | Filing with Lehigh County Court of Common Pleas Notice of Removal..... | 15.00 |
| | Total | \$172.00 |

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| Defendant | : | |

CERTIFICATE OF SERVICE

I, Sean M. Hart, Esquire, attorney for Defendant, St. Luke’s Hospital–Allentown Campus,,
certify that on this 21st day of May, 2003, service of a true and complete copy of the above and
foregoing Defendant’s Bill of Costs was made upon each party or attorney of record herein via first
class mail properly addressed as follows:

Donald P. Russo, Esquire
117 East Broad Street
Suite 300
P.O. Box 1890
Bethlehem, PA 18016-1890

HEIMBACH, SPITKO & HECKMAN

By _____
Sean M. Hart